

ORIGINAL

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

SEP 16 2009
at 11 o'clock and 50 min. a.m. *eps*
CUE BEITIA, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
DANIEL GUERRERO SEGUERRE, III,)
)
Defendant.)
)

CR 09-00375 DAE

CR. NO.
INDICTMENT
18 U.S.C. § 2251(a)
18 U.S.C. § 2252(a)(4)

INDICTMENT

COUNT 1

The Grand Jury charges that:

On a precise date unknown but by in or about August 2009, in the District of Hawaii, DANIEL GUERRERO SEGUERRE, III did employ, use, persuade, induce, entice, and coerce a minor whose initial is "A" to engage in sexually explicit conduct for

the purpose of producing a visual depiction of such conduct, which visual depiction was intended to be transported in interstate commerce, was produced using materials that had been mailed, shipped, and transported in interstate commerce, and was transported in interstate commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 2

The Grand Jury further charges that:

On a precise date unknown but by in or about August 2009, in the District of Hawaii, DANIEL GUERRERO SEGUERRE, III did employ, use, persuade, induce, entice, and coerce a minor whose initial is "E" to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was intended to be transported in interstate commerce, was produced using materials that had been mailed, shipped, and transported in interstate commerce, and was transported in interstate commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 3

The Grand Jury further charges that:

On a precise date unknown but by in or about August 2009, in the District of Hawaii, DANIEL GUERRERO SEGUERRE, III did employ, use, persuade, induce, entice, and coerce a minor whose initial is "R" to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was intended to be transported in interstate commerce, was produced using materials that had been mailed, shipped, and transported in interstate commerce, and was transported in interstate commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT 4

The Grand Jury further charges that:

On or about June 12, 2009, in the District of Hawaii, DANIEL GUERRERO SEGUERRE, III did knowingly possess matters, including computer media, which contained visual depictions that had been mailed, shipped and transported in interstate and foreign commerce, and which were produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, by any means including by computer, the production of which involved the use of a minor engaging in

sexually explicit conduct, and which visual depictions were of such conduct.

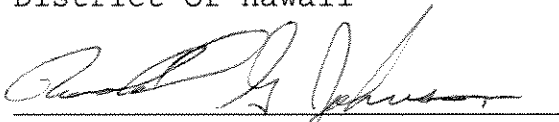
In violation of Title 18, United States Code, Section 2252(a)(4) and 2252(b)(2).

DATED: September 16, 2009, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson
FOREPERSON, GRAND JURY

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii


RONALD G. JOHNSON
Chief, Major Crimes


AMY K. OLSON
Assistant U.S. Attorney

United States vs. DANIEL GUERRERO SEGUERRE, III
Cr. No.
"Indictment"